



GABRIEL P. HARVIS
BAREE N. FETT

August 30, 2016

BY ECF

Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11211

Re: *Nelson, et al. v. Rahman, et al.*, 15 CV 4988 (KAM) (PK)

Your Honor:

I represent plaintiffs in the above-referenced civil rights action. I write pursuant to ¶ 6 of the Court's order dated August 15, 2016 to respectfully enclose a proposed order in connection with outstanding NYPD and Kings County District Attorney documents.

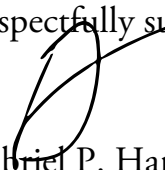
As directed, plaintiffs outlined missing discovery by e-mail to defense counsel on August 18, 2016. The parties have met and conferred extensively and, as of this writing, neither the documents listed in the attached order nor an appropriate verification regarding them has been provided. Thus, plaintiffs' respectfully request that the Court review and endorse the enclosed order.¹

¹ Independent of the discovery referenced in ¶ 6 of the Court's August 15th order, plaintiffs note that materials due today under ¶¶ 3 and 4 of that order remain outstanding as of this writing. Plaintiffs have also received no information concerning defendants' investigation into the discrepancy regarding the warrant application hearing referenced at ¶ 5 of the August 15th order.

Hon. Peggy Kuo
August 30, 2016

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

Encl.

cc: Amanda Shoffel, Esq.